

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MAGALY CAMACHO et al.

Plaintiffs,

v.

WILLIAM FRANCIS GALVIN,
in his official capacity as Secretary of the
Commonwealth of Massachusetts,

Defendant.

Civil Action No. 02-10428-DPW

AFFIDAVIT OF JUAN VEGA

I, Juan Vega, hereby depose and state as follows:

1. I am a plaintiff in this action. I am a Latino resident of 26 Shawmut Street, Chelsea, Massachusetts. I have lived in Chelsea my entire life.
2. I have run for public office in Chelsea a number of times, including for the School Committee in 1989, for the Board of Aldermen from ward one in 1991 and 1993, for the City Council (which replaced the Board of Aldermen) from district six in 1994, 1997, and 1999. I served on the Board of Aldermen in 1994, and on the City Council from 1995 until February 2001.
3. I spent a large part of election day in each of the years when I ran for office stationed outside of the polling places in the ward or district where I was running for office. On each election day, a number of Latinos told me immediately upon exiting the polling place that they had not been allowed to vote. In most cases, these Latinos told me that they had not been allowed to vote because their names did not appear on the list of registered voters. They also told me that the warden had not called the City Clerk to

determine whether they were registered to vote despite not appearing on the list, as I understand the warden to be required to do by state election law.

4. On each election day, a number of Latinos have also told me, immediately upon exiting the polling place, that they had been asked by a poll worker to produce identification. My understanding is that state election law requires an identification check of one out of every fifty people who come to the polling place to vote. Based on my election-day observations, nearly every one of the voters asked to produce identification at the polling place in question was Latino.

5. I was a member of the Board of Aldermen when Chelsea rewrote its city charter in 1994, following a period of receivership over the city's finances. Other Latino leaders and I recommended to the charter review commission urging it to switch from an at-large system of electing the School Committee to a system of elections by district. We explained to the commission that only one Latino had ever served on the School Committee, despite the fact that the majority of children in the Chelsea public schools were Latino. The charter review commission turned down the proposal, and maintained the system of at-large elections to the School Committee.

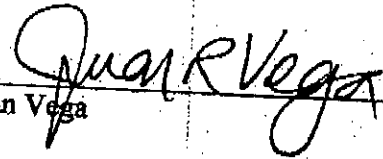
6. The new city charter came up for review again in 2000, when I was a member of the city council. Since 1994, no new Latinos had been elected to the School Committee. Roy Avellanada, another Latino member of the city council, brought a motion before the council that it recommend to the charter review commission that at-large elections for the School Committee be abolished. Following some discussion, the motion was tabled indefinitely.

7. Other Latino leaders and I also appeared before the review commission in 2000 asking that at-large elections for the School Committee be abolished. The review commission again turned down the proposal, maintaining the system of at-large elections to the School Committee.

Signed and sworn to this 25th day of May 2003 under the pains and penalties of perjury:

Juan Vega

Signed and sworn to this 25th day of May 2003 under the pains and penalties of perjury:


Juan Vega

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (by hand) on 5/27/03

